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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**[PROPOSED] ORDER GRANTING
FACEBOOK, INC.'S RENEWED
ADMINISTRATIVE MOTION TO SEAL**

AMENDED [PROPOSED] ORDER

The Court has considered Facebook, Inc.'s ("Facebook") Renewed Administrative Motion to Seal, which proposes to redact limited portions of the following documents:

Document	Previous Dkt. Nos.	Description of Portions Sought to Be Kept Under Seal
Plaintiffs' Exhibit 33	Dkts. 906-9, 906-10	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Ex. 33 at 68, 69, 72, 123–127, 142, 144, 166, 167, 172–175, 179–181, 193–206, 227–410, 513–526, 531–616, 619, 62, 665, 666, 697, 698, 701, 703, 704, 706, 707, 711, 714–716, 718, 722, 723, 752, 756, 757, 762, 763, 765, 766, 770, 773–777, 788–792, 794, 800–803.
Plaintiffs' Exhibit 34	Dkts. 906-11, 906-12	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Ex. 34 at 9–10, 12–13.
Plaintiffs' Exhibit 51	Dkts. 906-13, 906-14	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Ex. 51 at 29–30, 33, 84–88.
Plaintiffs' Exhibit 63	Dkt. 906-21	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Ex. 63 at 3–5, 7.
Plaintiffs' Exhibit 65	Dkt. 907-1	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Ex. 65 at 3, 9–10, 12–13, 17.
Plaintiffs' Exhibit 66	Dkt. 907-2	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Ex. 66 at 1–2, 5–6, 8–11.
Plaintiffs' Exhibit 67	Dkt. 907-3	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Ex. 67 at 11–12, 14, 16–17, 19–20, 22–23, 26–27, 29. Limited portions that reveal confidential and competitively sensitive information regarding Facebook's employees. <i>Id.</i> at 169–170, 175, 178, 184, 188.
Plaintiffs' Exhibit 68	Dkt. 907-4	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Ex. 68 at 1–2, 4, 9–11, 15–16.

Defendants' Exhibit 7	Dkts. 910-3, 910-4	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Defendants' Ex. 7 at 69:5-6, 108:1-12, 113:13-23, 114:24-115:1, 129:9-25, 130:2-3. Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, and decisions. <i>Id.</i> at 61:10-21, 65:12-14, 65:17-66:5, 66:19-23, 66:25-67:11, 69:11-13, 69:16-20, 69:22-25, 70:1-12, 70:20-25, 79:17-78:2, 80:20-81:19, 82:17-19, 83:24-84:1, 85:7-10, 85:13, 85:16-19, 86:9-10, 86:13-22, 88:24-89:2, 89:4-6, 89:8-13, 90:2-3, 90:5-11, 90:20-21, 90:23, 91:1-4, 91:8-10, 91:14, 91:24, 92:2-4, 92:14-16, 92:22-23, 97:3-5, 106:20-107:11, 107:15-16, 107:19-21, 107:22-24, 116:17-25, 130:21-24, 131:21-23, 132:1-4, 132:6-8, 132:19-21, 132:24-25. Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 129:9-25, 130:2-3, 133:9-10, 133:12, 133:16-17, 133:20-22, 133:24, 134:3-5, 134:8-10, 134:12-13.
Defendant's Exhibit 9	Dkts. 910-7, 910-8	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Defendants' Ex. 9 at 3, 5.
Defendant's Exhibit 20	Dkts. 910-9, 910-10	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Defendants' Ex. 20 at 4, 8, 14-15, 17-18, 22, 25-29.
Defendant's Exhibit 25	Dkts. 910-15, 910-16	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Defendants' Ex. 25 at 3, 7-8, 16-17, 19-22, 26-33, 37, 41-42.
Defendant's Exhibit 41	Dkts. 910-29, 910-30	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Defendants' Ex. 41 at 31-37, 39. Limited portions that reveal confidential and competitively sensitive information regarding Facebook's employees. <i>Id.</i> at 8-9.
Plaintiffs' Reply Exhibit 74	Dkt. 927-4	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Reply Ex. 74 at 3, 8, 17-24, 29-44.

		<ul style="list-style-type: none"> Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, and decisions. <i>Id.</i> at 7.
Special Master's Amended Order Regarding Production of Named Plaintiff Data and the Exhibits thereto	Dkts. 981-3, 981-4	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Special Master's Amended Order at 114–117, 128–120, 137–138, 150–152, 156–158, 160, 162, 167, 170, 172–173, 178, 183–185, 191, 202, 211, 217, 220, 222, 227, 237, 284, 286, 327–328, 358–359, 398, 400–401, 413, 424, 428, 435, 446, 458, 460–461, 463, 465, 476–477, 488–489, 492, 549, 570, 572, 582–583, 588–589, 602–604, 606, 627–628, 633–634, 637, 655, 670, 672–673, 676, 679, 758–759, 772–774, 789, 792–797, 831. Limited portions that reveal confidential and competitively sensitive information regarding Facebook's employees. <i>Id.</i> at 549–550. Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, and decisions. <i>Id.</i> at 758, 772.
Plaintiffs' Supplemental Exhibit 90	Dkt. 988-8	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Supplemental Ex. 90 at 16–17, 33–34, 36. Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 17, 33–34, 36.
Plaintiffs' Supplemental Exhibit 91	Dkt. 988-9	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Supplemental Ex. 91 at 17–18. Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 1–2.
Plaintiffs' Supplemental Exhibit 92	Dkt. 988-10	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Supplemental Ex. 92 at 1–2, 8–9. Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 1–2, 5–6, 8.
Plaintiffs' Supplemental Exhibit 93	Dkt. 988-11	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. Plaintiffs' Supplemental Ex. 93 at 1, 3.

1	Plaintiffs' Supplemental Exhibit 95	Dkts. 991-5, 992-3	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Supplemental Ex. 95 at 42:5-6, 11-15.
2	Plaintiffs' Supplemental Exhibit 96	Dkts. 991-6, 992-4	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Supplemental Ex. 96 at 2-3.
3	Plaintiffs' Supplemental Exhibit 106	Dkts. 991-9, 992-7	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Supplemental Ex. 106 (Chang Tr.) at 163:9-10, 11, 13, 15; 182:5, 19-20; 223:8, 224:21-22; 225:5; pdf pages 29-30.
4	Plaintiffs' Supplemental Exhibit 112	Dkts. 1012-9, 1013-7	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Supplemental Ex. 112 at 2. Limited portions that reveal confidential and competitively sensitive information regarding Facebook's employees. <i>Id.</i> at 2-8.
5	Plaintiffs' Supplemental Exhibit 121	Dkt. 988-38	<ul style="list-style-type: none"> Limited portions that reveal confidential and competitively sensitive information regarding Facebook's employees. Plaintiffs' Supplemental Ex. 121 at 5.
6	Plaintiffs' Supplemental Exhibit 139	Dkts. 1012-15, 1013-13	<ul style="list-style-type: none"> Limited portions that reveal confidential and competitively sensitive information regarding Facebook's employees. Plaintiffs' Supplemental Ex. 139 at 1.
7	Plaintiffs' Exhibit 95 (Duffey Dep. Tr.)	Dkts. 1038-5, 1038-13	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Ex. 95 at 42:5-6, 11-15; 54:3-5; 57:16-17, 22-23; 58:12; 64:24-25; 65:16-18; 23-25; 66:1-4; 79:12; 83:14-16; 96:21-22, 25; 97:2; 158:5-6.
8	Plaintiffs' Exhibit 106 (Chang Dep. Tr.)	Dkts. 1038-9, 1038-17	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Ex. 106 at 74:19, 24; 75:19-20; 76:21; 77:4, 7-8; 24-25; 78:11-23; 79:7-9; 80:21-22; 81:4, 81:25-82:3; 82:9-14, 18, 20 - 22; 82:24-83:3; 83:9-11; 84:6-7, 10, 20; 85:3-5, 7, 11; 110:2-4, 6-7; 114:4, 12; 116:22-24; 127:22; 128:2, 6, 11-12, 19; 154:2, 24; 155:2; 156:17; 162:22, 25; 163:9-10, 11, 13, 15; 182:5, 19-20; 184:4-5, 9-10; 203:6, 8, 11-14, 20-25; 204:1-2, 19-22, 24-25; 205:4-5, 7-8, 10-11, 13-14, 20-25; 206: 1-4, 9-16; 222:2-3, 22-23; 223:8, 224:21-22; 225:5; 227:12-16; 24-25; 228:1, 14-20, 24; 229: 2-6, 10, 12; 231:5; 231:21-22; 232:1-4; 233:9-10, 14-23, 25; 234:1-4;

		237:6, 9; 252:11–13; 283:12–14, 16, 18; 284:1; 285:3–5, 9–11, 22. <ul style="list-style-type: none"> Limited portions that reveal confidential and competitively sensitive information regarding Facebook’s employees. <i>Id.</i> at 207:16, 22; 208:5.
Richardson Declaration ISO Facebook, Inc., Gibson, Dunn & Crutcher LLP, and Orin Snyder’s Supplemental Brief in Opposition to Plaintiffs’ Motion for Sanctions	Dkts. 1016-4, 1017-2	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook’s proprietary data systems and data storage and processing practices. Richardson Decl. at 5.
Defendant’s Supplemental Exhibit 56	Dkts. 1016-6, 1017-4	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook’s proprietary data systems and data storage and processing practices. Defendant’s Supplemental Ex. 56 at 185:4–7, 9–10, 12–14, 16, 18.
Defendant’s Supplemental Exhibit 64	Dkts. 1016-9, 1017-7	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook’s proprietary data systems and data storage and processing practices. Defendant’s Supplemental Ex. 64 at 5. Limited portions that reveal confidential and competitively sensitive information regarding Facebook’s business programs, strategies, and decisions. <i>Id.</i> at 4.
Defendant’s Supplemental Exhibit 73	Dkts. 1016-14, 1017-12	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook’s proprietary data systems and data storage and processing practices. Defendants’ Supplemental Ex. 73 at 2–3, 5.

Good cause having been shown, Plaintiffs’ Administrative Motion To Consider Whether Another Party’s Materials Should Be Sealed is GRANTED. The Court hereby ORDERS:

1. The redacted versions of the following documents shall be filed on the public docket:
 - A. Plaintiffs’ Exhibits (including Reply and Supplemental Exhibits) 33, 34, 51, 63, 65–68, 74, 90–93, 95, 96, 106, 112, 121, and 139, attached with the same numbering and “-B” to the Stein Declaration.
 - B. Defendants’ Exhibits (including Supplemental Exhibits) 7, 9, 20, 25, 41, 56, 64, and 73, attached with the same numbering and “-B” to the Stein Declaration.
 - C. The full deposition transcripts of Michael Duffey and Jackie Chang, attached as Exhibits 1-B and 2-B, respectively, to the Stein Declaration.
 - D. Special Master’s Amended Order Regarding Production of Named Plaintiff Data and the Exhibits thereto, attached as Exhibit 3-B to the Stein Declaration.

E. Richardson Declaration ISO Facebook, Inc., Gibson, Dunn & Crutcher LLP, and Orin Snyder's Supplemental Brief in Opposition to Plaintiffs' Motion for Sanctions, attached as Exhibit 4-B to the Stein Declaration.

2. The unredacted versions of the following documents shall be sealed permanently:

- A. Plaintiffs' Exhibits (including Reply and Supplemental Exhibits) 33, 34, 51, 63, 65–68, 74, 90–93, 95, 96, 106, 112, 121, and 139, attached with the same numbering and “-A” to the Stein Declaration.
- B. Defendants' Exhibits (including Supplemental Exhibits) 7, 9, 20, 25, 41, 56, 64, and 73, attached with the same numbering and “-A” to the Stein Declaration.
- C. The full deposition transcripts of Michael Duffey and Jackie Chang, attached as Exhibits 1-A and 2-A, respectively, to the Stein Declaration.
- D. Special Master's Amended Order Regarding Production of Named Plaintiff Data and the Exhibits thereto, attached as Exhibit 3-A to the Stein Declaration.
- E. Richardson Declaration ISO Facebook, Inc., Gibson, Dunn & Crutcher LLP, and Orin Snyder's Supplemental Brief in Opposition to Plaintiffs' Motion for Sanctions, attached as Exhibit 4-A to the Stein Declaration.

IT IS SO ORDERED.

DATE: _____

VINCE CHHABRIA
United States District Judge